

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Commonwealth Edison Company	)	
	)	00-0259
Petition for Expedited Approval of	)	
Implementation of a Market-Based	)	
Alternative Tariff, to become effective	)	
on or before May, 2000, pursuant to Article	)	
IX and Section 16-112 of the Public	)	(Cons.)
Utilities Act.	)	
	)	
Central Illinois Public Service Company )		
Union Electric Company	)	00-0395
	)	
Petition for Approval of Revisions to	)	
Market Value Tariff, Rider MV	)	
	)	
Illinois Power Company	)	
	)	
Proposed New Rider MVI and Revisions	)	00-0461
Revisions to Rider TC	)	

**NOTICE OF FILING**

**PLEASE TAKE NOTICE** that on this date, January 9, 2001, we have filed with the Chief Clerk of the Illinois Commerce Commission the enclosed People of The State of Illinois' Response to Motion for Additional Hearings and Motion for Leave to File Instantly via e-docket to the Chief Clerk of the Illinois Commission at 527 East Capitol Avenue, Springfield, Illinois 62794-9280.

\_\_\_\_\_  
Mark G. Kaminski  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, Mark G. Kaminski, Assistant Attorney General, hereby certify that I served the above identified documents upon all active parties of record on the attached service list by United States Mail, first class postage prepaid on January 9, 2001, and by electronic mail to all active parties.

\_\_\_\_\_  
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**MOTION FOR LEAVE TO FILE INSTANTER**

NOW COMES the People of the State of Illinois, ex. al. James E. Ryan, Attorney General of Illinois (herein after “the People”), pursuant to 83 Ill. Adm. Code 200.190, and files this Motion for Leave to File Instanter.

By reason of concurrent illness of the attorneys on this case, the People were unable to file their response to the Motion for Additional Hearings of NewEnergy Midwest, L.L.C. on the due date of January 8, 2001. The People therefore request the Commission to grant leave to file the attached People of the State of Illinois’s Response to Motion for Additional Hearings instanter.

JAMES E. RYAN,  
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By: \_\_\_\_\_  
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January 9, 2001

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**PEOPLE OF THE STATE OF ILLINOIS’  
RESPONSE TO MOTION FOR ADDITIONAL HEARINGS**

NOW COMES the People of the State of Illinois, ex. al. James E. Ryan, Attorney General of Illinois (herein after “the People”), pursuant to the Notice from the Chief Clerk, dated January 2, 2001, and hereby responds to the Motion for Additional Hearings of New Energy Midwest, L.L.C., (“NewEnergy”).

The People support NewEnergy’s request to hold additional hearings for the purpose of examining optionality adjustments. These additional hearings will better inform the record regarding the adjustments necessary to better reflect the cost of acquiring capacity to meet off-peak retail load requirements. A better informed record allows for a more complete order. The People agree with New Energy that the additional hearings would not unduly delay a final order in this proceeding.

JAMES E. RYAN,  
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By: \_\_\_\_\_  
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January 9, 2001

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